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17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 *In re: Hyundai and Kia Engine*
20 *Litigation II*

Case No. 8:18-cv-02223-JLS-JDE

**PLAINTIFFS' SECOND
SUPPLEMENTAL BRIEF IN
SUPPORT OF MOTION FOR
CLASS COUNSEL FEE AND
EXPENSE AWARD AND CLASS
REPRESENTATIVE SERVICE
AWARDS**

1 Plaintiffs submit this second supplement of Plaintiffs' Counsel's time and
2 expenses incurred in further support of their Motion for Class Counsel Fee and Expense
3 Award and Class Representative Service Awards. *See* Dkts. 106, 130. The time and
4 expenses are outlined in the accompanying supplemental Declarations of Steve W.
5 Berman, Matthew D. Schelkopf, Gretchen Freeman Cappio, Bonner C. Walsh, Adam
6 Gonnelli, H. Clay Barnett, III, and Jonathan D. Boggs. Class Counsel will submit the
7 supplemental detailed time records in Excel format to the Court concurrently with this
8 filing.

9 From August 24, 2023, to January 4, 2024, Plaintiffs' Counsel spent 1,027.3
10 hours working on this case, for an additional lodestar of \$675,586.50. When combined
11 with the previously submitted amounts, this increases the overall lodestar to
12 \$6,411,204.50. For this period, Plaintiffs' Counsel also incurred \$30,688.39 in costs,
13 increasing the total costs to \$318,926.97. Compared with Plaintiffs' \$8,900,000 fee
14 request, this reflects a current lodestar multiplier of 1.39.

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16 DATED: January 17, 2024

Respectfully submitted,

17 /s/ Steve W. Berman

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